

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Handwritten: *Cheryl - Info on Env. Permit Support & D. 5/14/85*

DATE: July 19, 1983

SUBJECT: Technical Assistance From Environmental Services Division,
Surveillance Branch, Air Section on Hazardous Waste Incinerator
Permit Applications and Trial Burn Plans

FROM: Richard C. Boynton, Chief, Permits and CT Waste Programs Section

TO: Dennis Huebner, Chief, State Waste Programs Branch

On July 19, 1983 Tom Michel, Bill Torrey, Steve Yee and I met with Don Porteous and John Carlson to discuss the scope of assistance and the form of the work output Don's group would provide to us for hazardous waste incinerator permits.

For the trial burn plan, test schedule and protocol; and sampling and monitoring, Don's section will:

1. Develop, complete and send to the permit engineer a checklist for each trial burn plan forward to them.
2. Append major comments on the trial burn plan to the checklist.
3. Coordinate the review of the QA/QC and the sampling and analysis protocol with the Analysis Branch and include any comments in their review.

For the engineering description operations and emission controls Don's section will:

1. Review the description in the permit application and will point out in a memo to the permit engineer the information needed to make decisions on residence times, emission controls, monitoring points etc.

The permit engineer will review the management plans (waste analysis; applicants choice of POHC's) and put together an NOD which includes the Air Section's work. After the NOD is forwarded to the applicant a meeting will be scheduled by the permit engineer or state engineer with the applicant, the permit engineer, a person from the Air Section and state engineer to discuss the deficiencies as well as what is required for a complete trial burn plan. Also at this time a tentative protocol and test schedule will be worked out with the applicant.

RECEIVED

AUG 1 1983

HAZARDOUS MATERIALS
MANAGEMENT UNIT

Handwritten: *PICS ? TO*

RCRA RECORDS CENTER
FACILITY *Pro # & Whitney Main St*
I.D. NO. *CTD99067081*
FILE LOC. *R-1B*
OTHER *RMS #2703*

Handwritten: *JOHN CARLSON*
AIR SECTION
LEXINGTON LAB
5-23-85

The completed trial burn plan (pretest report) which is submitted with the response to the NOD will be reviewed by the Air Section for sufficiency. Any misunderstandings, discrepancies or questionable details will be worked out in another meeting with the applicant if necessary.

Prior to conducting the actual burn a performance spec. test will be conducted and observed by a person from the Air Section. The evaluation and results will be reported in a memo to the permit engineer. (The performance spec. test is necessary for calibration of the monitoring equipment).

The trial burn will be scheduled and at least one person from the Air Section will observe the conduct of the trial burn. (Persons observing the trial burn most likely will be the permit engineer, at least one person from the Air Section, and at least one person from the state agency.)

The applicant will be allowed 30 days to submit the resultant trial burn data to the permit engineer. A copy will be forwarded to the Air Section where it will be reviewed; the calculations validated and the results of the review reported back to the permit writer within 30 days of receipt of the data.

The permit engineer will draft the permit specifying the:

• CO level in the stack exhaust gas

• waste feed rate

• combustion temperature

• combustion gas flow rate

A copy of the draft permit will be forwarded to the Air Section. It will be marked up with any comments, dated and signed by the person reviewing it and be returned to the permit engineer. (A one week turn around should be adequate).

If questions arise concerning the draft permit from the applicant or the state engineer prior to public notice of the draft permit, the Air Section engineer will be available to discuss any information related to specification of the operating conditions.

After public notice and a public hearing, should a hearing be held, the Air Section will provide assistance in preparation of any response to comments which relate directly to the operating conditions and trial burn results.

Should a permit appeal be based upon the trial burn results and permitted operating conditions the Air Section will provide the assistance necessary in those areas to sustain EPA's position against the appeal.

All contact with the applicant will be through the permit engineer or state agency unless otherwise discussed and agreed upon.

cc: Don Porteous, ESD, Lexington, MA